

CLIFF PALEFSKY, ESQ. (SBN 77683)  
KEITH EHRMAN, ESQ. (SBN 106985)  
MCGUINN, HILLSMAN & PALEFSKY  
535 Pacific Avenue  
San Francisco, California 94133  
Telephone: 415.421.9292  
Facsimile: 415.403.0202  
Email: [uroy2@aol.com](mailto:uroy2@aol.com)  
[kaemhp@aol.com](mailto:kaemhp@aol.com)

Attorneys for Plaintiff  
TAYLOR BAYER

JOANNA L. BROOKS (SBN 182986)  
JACKSON LEWIS LLP  
199 Fremont Street, 10th Floor  
San Francisco, CA 94105  
Telephone: 415.394.9400  
Facsimile: 415.394.9401  
Email: [brooks@jacksonlewis.com](mailto:brooks@jacksonlewis.com)

SHERRY L. SWIECA (SBN 198700)  
JACKSON LEWIS LLP  
725 South Figueroa Street, Suite 2500  
Los Angeles, CA 90017-5408  
Telephone: 213.689.0404  
Facsimile: 213.689.0430  
Email: [swiecas@jacksonlewis.com](mailto:swiecas@jacksonlewis.com)

KAREN E. GRIFFIN (TBN 00796680)  
ALLYSON L. JOHNSON (SBN 248042)  
JACKSON LEWIS LLP  
3811 Turtle Creek Blvd., Suite 500  
Dallas, TX 75219  
Telephone: 214.520.2400  
Facsimile: 214.520.2008  
Email: [griffink@jacksonlewis.com](mailto:griffink@jacksonlewis.com)  
[johnsona@jacksonlewis.com](mailto:johnsona@jacksonlewis.com)

Attorneys for Defendant  
THE NEIMAN MARCUS GROUP, INC.  
(erroneously sued as NEIMAN MARCUS  
HOLDINGS, INC.)

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

TAYLOR BAYER,

Plaintiff,

v.

NEIMAN MARCUS HOLDINGS, INC.,

Defendant.

Case No. 11-CV-03705-MEJ

(Assigned for all purposes to Honorable  
Maria-Elena James)

**STIPULATION FOR EXTENSION OF  
DATES FOR ADR AND RULE 26F  
CONFERENCE**

Courtroom: B  
Judge: Hon. Maria-Elena James

WHEREAS Plaintiff, TAYLOR BAYER (“Plaintiff”) AND Defendant NEIMAN  
MARCUS GROUP, INC. (erroneously sued as NEIMAN MARCUS HOLDINGS, INC.)

1 (“Defendant”) (collectively the “parties”), will appear for a hearing on Defendant’s Motion to  
2 Compel Arbitration on November 17, 2011.

3 WHEREAS the parties seek to extend the current deadlines to file and serve ADR  
4 certification, file stipulation to ADR process and to confer pursuant to Federal Rule of Civil  
5 Procedure Rule 26(f) until after the November 17, 2011 hearing on Defendant’s Motion to  
6 Compel Arbitration before incurring unnecessary attorneys’ fees and expenses.

7 **IT IS HEREBY STIPULATED AS FOLLOWS:**

8 In light of Defendant's pending Motion and the parties' desire to have that Motion  
9 determined before they conduct the various case management and pre-trial matters:

10 1. The deadline to meet and confer regarding initial disclosures, early settlement,  
11 ADR process selection and discovery plan currently scheduled for October 20, 2011 shall be  
12 extended to November 22, 2011;

13 2. The deadline to file ADR Certification signed by Parties and Counsel currently  
14 scheduled for October 20, 2011 shall be extended to December 22, 2011;

15 3. The deadline to file either stipulation to ADR Process or Notice of Need for ADR  
16 Phone Conference currently scheduled for October 20, 2011 shall be extended to December 22,  
17 2011;

18 4. The deadline for the parties’ to file their Joint Case Management Conference  
19 Statement currently scheduled to be filed on November 3, 2011, shall be filed no later than  
; 20 January 5, 2012

21 5. The parties’ Initial Disclosures shall be due no later than January 5, 2012; and

22 6. The Initial Case Management Conference, currently scheduled for November 10,  
23 2011 at 10:00 a.m., will be scheduled for January 12, 2011 at 10:00 a.m.

1 Dated: October 20, 2011

2 JACKSON LEWIS LLP

3  
4 By: /s/ JoAnna L. Brooks  
5 Attorneys for Defendant  
6 The NEIMAN MARCUS GROUP,  
INC. (erroneously sued as NEIMAN  
MARCUS HOLDINGS, INC.)

7  
8 Dated: October 20, 2011

9 McGUINN HILLSMAN & PALEFSKY

10  
11 By: /s/ Keith Ehrman  
12 Attorneys for Plaintiff  
TAYLER BAYER

13 **IT IS SO ORDERED.**

14 Dated: October <sup>21</sup>\_\_\_\_, 2011

15   
16 HONORABLE MARIA-ELENA JAMES  
17 United States Magistrate Judge

18 4811-4817-3836, v. 1